

**SUPPORTING STATEMENT**  
**FOR THE**  
**ADMINISTRATION FOR NATIVE AMERICANS (ANA)**  
**ON-GOING PROGRESS REPORT (OPR)**  
**OBJECTIVE WORK PLAN (OWP)**

OMB No. 0970-0452

**A. Justification**

**1. Circumstances Making the Collection of Information Necessary**

Content changes are being made to the Objective Progress Report, now known as the Ongoing Progress Report (OPR) and Objective Work Plan (OWP) previously approved under information collection (OMB No. 0970-0452).

The Objective Work Plan (OWP) information collection is conducted in accordance with 42 USC of the Native American Programs Act of 1972, as amended. This collection is necessary to evaluate applications for financial assistance and determine the relative merits of the projects for which such assistance is requested, as set forth in Sec. 806 [42 USC 2991d-1](a)(1).

The Ongoing Progress Report information collection is conducted in accordance with Sec. 811 [42 USC 2992] of the Native American Programs Act and will allow ANA to report quantifiable results across all program areas. It also provides grantees with parameters for reporting their progress and helps ANA better monitor and determine the effectiveness of their projects.

**2. Purpose and Use of the Information Collection**

The Ongoing Progress Report (OPR) is submitted to ANA on a semi-annual basis and provides grantees with a set format by which they report on their performance indicators, progress achieved, and training and technical assistance needs. This standardized format allows ANA to monitor grantee progress, identify grantees that may need training and/or technical assistance, and report quantifiable results to Congress.

The information collected in the Objective Work Plan (OWP) is used by ANA to determine if an applicant has a viable implementation plan from which to carry out a proposed project. Applicants are required to complete this as part of their funding application package. The OWP is a planning and implementation tool which requires applicants to map out their goals, objectives, activities, resources, and time frames for their projects. It is used on the front end during the panel review process, and by ANA program specialists throughout the grant period to compare projected objectives and activities against actual accomplishments in order to gauge grantees' progress.

## **Adjustments to Specific Sections of the OWP.**

Problem Statement section is removed.

Results and Benefits section is renamed Outcomes and the applicant will be required to state expected outcomes as opposed to results and benefits.

Criteria for Evaluating results and benefits will be removed.

Lead Position Performing the activity section will be renamed to Outputs and the applicant will be required to state expected outputs.

Other Support performing the activity will be renamed to Project Staff where the applicant will list any staff performing the activity.

## **Adjustments to Specific Sections of OPR.**

### **Objective Work Plan Status Update**

The OWP section of the OPR will be updated per the changes above.

### **3. Use of Improved Information Technology and Burden Reduction**

Applicants are able to electronically submit the OWP through [www.grants.gov](http://www.grants.gov). The OPR is an online form which grantees can complete electronically and submit in the GrantSolutions system, a Grants Management Center of Excellence managed by the Administration for Children and Families (ACF).

### **4. Efforts to Identify Duplication and Use of Similar Information**

ANA has reviewed information collection instruments and has determined that there are no existing forms that can be used to meet ANA's data collection needs.

### **5. Impact on Small Businesses or Other Small Entities**

The information being requested has been held to the absolute minimum required for the intended use.

### **6. Consequences of Collecting the Information Less Frequently**

Failure to collect this information would violate the legislative mandate of the Native American Programs Act of 1974 as amended. The OWP is required one-time only (at time of application), and the OPR is only required to be collected on a semi-annual basis in order to effectively monitor ANA projects. Completing the OPR is a reporting requirement as a term and condition of an ANA grant award.

### **7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

There are no special circumstances requiring these collections to be conducted in any manner described in Item #7 of the OMB Supporting Statement Instructions.

**8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

The 60-day Federal Register Notice, Vol. 82, No. 136, page 27833, published on June 19, 2017. No public comments were received in response to this notice.

**9. Explanation of Any Payment or Gift to Respondents**

No payments or gifts have been or will be provided to any respondents.

**10. Assurance of Confidentiality Provided to Respondents**

Information being requested in the OWP and OPR is not considered confidential. Therefore, no additional safeguards are considered necessary beyond those that are customarily applied to routine government information. In rare cases, grantees may insert or attach information to their OPRs, such as community meeting attendance lists that include contact information. ANA will take reasonable precautions to keep information contained in the OPR private to the extent permitted by law. The OWP and OPR are "housed" electronically on the ACF GrantSolutions system.

**11. Justification for Sensitive Questions**

This is not applicable. No information of a sensitive nature is requested in the OWP or OPR.

**12. Estimates of Annualized Burden Hours and Costs**

The following is the hour of burden estimate for this information collection:

<b>INSTRUMENT</b>	<b>NUMBER OF RESPONDENTS</b>	<b>NUMBER OF RESPONSES PER RESPONDENT</b>	<b>AVERAGE BURDEN HOURS PER RESPONSE</b>	<b>TOTAL BURDEN HOURS</b>
OWP	500	1	3	1,500
OPR	275	2	1	550

**Estimated Total Annual Burden Hours: 2,050**

The dollar equivalent would be \$40 X 1,550 hours or \$60,000.

The dollar equivalent would be \$24 X 550 hours or \$13,200.

**13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers**

The annual cost burden to respondents or record keepers resulting from the collection of information is expected to be \$13,200 as part of on-going project management.

#### **14. Annualized Cost to the Federal Government**

The estimated annualized cost to the federal government to collect and analyze this data is expected to be zero.

#### **15. Explanation for Program Changes or Adjustments**

##### **Adjustments to Specific Sections of the OWP.**

Problem Statement section is removed as ANA will no longer require discretionary grant applicants to have a problem statement in their application.

Results and Benefits section is renamed Outcomes and the applicant will be required to state expected outcomes as opposed to results and benefits. ANA will no longer require applicants for discretionary funding to state expected results and/or benefits. ANA is now interest in the Outcomes versus results or benefits.

Criteria for Evaluating results and benefits will be removed as ANA is no longer requiring applicants to list results nad benefits.

Lead Position Performing the activity section will be renamed to Outputs and the applicant will be required to state expected outputs. This section is converted to allow applicants to list the outputs of their proposed project.

Other Support performing the activity will be renamed to Project Staff where the applicant will list any staff performing the activity. This section will now capture all staff proposed to work on individual activities.

##### **Adjustments to Specific Sections of OPR.**

##### **Objective Work Plan Status Update**

The OWP section of the OPR will be updated per the changes above.

#### **16. Plans for Tabulation and Publication and Project Time Schedule**

The OWP form will be made available on Grants.gov and the ACF Grants webpage. OPR's will be tabulated and the aggregate data shared with Congress and other stakeholders on an annual basis.

#### **17. Reasons(s) Display of OMB Expiration Date is Inappropriate**

This is not applicable.

#### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

This is not applicable.

## **B. Statistical Methods (used for collection of information employing statistical methods)**

### **1. Respondent Universe and Sampling Methods**

Respondents are ANA applicants/grantees. Sampling methods are not applicable with this collection activity. The OWP is required one time only (at time of application). The OPR is required to be completed by grantees on a semi-annual basis in order to effectively monitor ANA projects.

### **2. Procedures for the Collection of Information**

The OWP form is part of the ANA grant application package. Applicants are required to complete and submit the form along with all other required documents at the time they are applying for a grant. The data collected is from all applicants that apply for ANA grant funds. The OPR is a grantee progress report form that is only submitted by those applicants who received ANA grant awards. The OPR is built as an online form and submitted directly by the grantee on ACF's GrantSolutions system into each awarded project's electronic file. Information collected from the OWP is keyed into a database by ANA staff from which annual reports are generated.

### **3. Methods to Maximize Response Rates and Deal with Non-response**

ANA maximizes the response rate by requiring that the OWP and OPR be completed and submitted with the grant application package. ANA also requires each grantee to complete the OPR semi-annually throughout the life of the project; thereby ensuring response rates are maximized.

### **4. Test of Procedures or Methods to be Undertaken**

ANA's data collection procedures and use of the OWP and OPR over the last 6 years have had satisfactory results. Therefore, testing will not be necessary.

### **5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data**

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